

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE BANK OF NEW YORK, as
Indenture Trustee

Plaintiff,

v.

TYCO INTERNATIONAL GROUP, S.A.,
and TYCO INTERNATIONAL, LTD

Defendants.

Docket No. 07 CV 4659 (SAS)

**NOTICE OF MOTION TO
INTERVENE PURSUANT TO
FED. R. CIV. PROC. 24 AND TO
JOIN PARTIES PURSUANT TO
FED. R. CIV. PROC. 20**

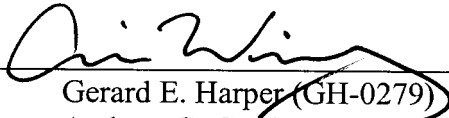
PLEASE TAKE NOTICE THAT upon the attached proposed Complaint and accompanying Memorandum of Law, and all other pleadings and papers filed in the above-captioned action, Intervenor-Plaintiffs, Unum Life Insurance Company of America, First Unum Life Insurance Company, Provident Life and Accident Insurance Company, Knights of Columbus, New York Life Insurance Company, New York Life Insurance and Annuity Corporation, SunAmerica Life Insurance Company, and The Variable Annuity Life Insurance Company by their attorneys, Paul, Weiss, Rifkind, Wharton & Garrison LLP, will move this Court before the Honorable Shira A. Scheindlin, at a date and time to be determined by this Court, for an order pursuant to Rule 24 of the Federal Rules of Civil Procedure granting Intervenor-Plaintiffs permission to intervene in the above-captioned action and for an order pursuant to Rule 20 of the Federal Rules of Civil Procedure granting Intervenor-Plaintiffs permission to join additional defendants. Responding papers, if any, must be served no later than June __, 2007.

Dated: New York, New York
June 25, 2007

Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

By: _____

A handwritten signature in black ink, appearing to read "Gerard E. Harper", is written over a horizontal line.

Gerard E. Harper (GH-0279)

Andrew G. Gordon (AG-9239)

Andrew N. Rosenberg (AR-1799)

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